

SUPPLEMENTAL COMMENTS OF VELA REASEARCH, L.P. ON NATIONAL CABLE
TELEVISION
ASSOCIATION AND THE MEDIA ACCESS PROJECT EX PARTE PRESENTATIONS
REGARDING
EAS DECODERS

Introduction

The Federal Communications Commission=B9s mandate for Emergency Alerting System is an important step in providing a nationwide alerting mechanism in the event of a national emergency. Vela recognizes that by its rulemaking and enforcement the FCC seeks maximum compliance. To have companies not participate creates "holes" in the network, thereby diminishing the ultimate goal of FCC and the overall effectiveness of the EAS.

We would hope that the FCC understands that many small cable companies are not associated with a larger MSO and, regardless of any MSO affiliation, may not have the revenues to purchase expensive equipment that provides no additional revenue opportunity. Sadly in fact many of these small systems are being encouraged to submit waivers for EAS, completely avoiding compliance thereby creating the "holes" mentioned above. Moreover, unlike most broadcast operations, most cable headends are unmanned and often remotely located. As such, operators are not "on-duty" to be able to make assessments of EAS messages and operate the equipment.

Vela agrees with the FCC=B9s vision of EAS and provides equipment that is used to communicate with cable television viewers. We are concerned though that the current EAS rules which mandate an Encoder/Decoder are restrictive and create additional costs that are functionally unnecessary. Technically the only reason a system needs an Encoder is to generate the required weekly (RWT) and required monthly (RMT) tests. Yet, by configuring the EAS equipment so all EAS events are auto-forwarded, including the RMT=B9s and RWT=B9s, an EAS Decoder-only receive location is able to adequately test the primary decoding equipment, and any downstream message and switching equipment for EAS compliance.

Since the current EAS requirements call for monitoring two stations, such as an AM or FM radio station, the RMT and RWT=B9s are already generated by those

monitored stations and subsequently passed to each receiving location. In this manner cable operators with a Decoder-only configuration would be able to receive EAS messages from the monitored sources and completely test EAS functionality on a weekly basis =8B in some instances twice a week =8B without having to originate their own tests. Allowing the monitored stations to generate the tests eliminates redundancy, cost, and complexity by eliminating the need for a local Encoder at the cable headend.

Our partner, TFT of Santa Clara, CA, manufacture the Safety 1st, a commercially available EAS Decoder-only product. This product, introduced in 1998, has been successfully deployed in a number of commercial (non-cable and non-broadcast) applications with great success. Since TFT is a preeminent supplier of type certified EAS Encoder/Decoders the creation of the Safety 1st, for the commercial/industrial market was a simple adaptation of existing product knowledge packaged to fit another market.

As a stand-alone product the TFT Safety 1st lacks only a couple of the capabilities to make it fully certifiable under Part 11 rules for EAS decoders. Presently, the TFT Safety 1st provides neither a digital input nor the ability to record and store the last 10 message header codes received. However, when combined with Vela=B9s EAS controller components, Vela and TFT are able to provide a fully compliant Decoder-only based EAS solution for the cable market. Furthermore, the EAS Decoder interfaces with Vela=B9s character generator(s) creating the visual EAS message display satisfying NAD requirements. With a favorable ruling of the FCC that would allow such Decoder-only solutions, we currently plan to submit this system for compliance testing in early Q1 of 2002.

It is important to understand that cost savings are significant. By eliminating the encoder function, an EAS Decoder-only package can reduce the cost by 64% over what a cable operator is forced to spend for an EAS Encoder/Decoder based solution. This price comparison is based on list pricing of presently available Encoder/Decoder and Decoder-only products.

Summary

Vela would like to ensure that more companies are encouraged to participate in EAS and the best way to encourage participation is to lower the entry cost . To this end Vela has advocated the adoption of a

Decoder-only revision to the rules governing cable television companies.
Doing so will do nothing to decrease the effectiveness of the overall EAS network, and in fact, should enhance it by reducing the incentive to those who would seek to waive compliance due to burdensome costs associated meeting the requirements. Simply making the system less costly makes it less attractive to go through the laborious process of filing waivers. Moreover, the FCC's administrative expenses are significantly reduced by not having to deal with each and every waiver filing.

We appreciate the FCC's kind consideration of these matters and seek the approval of the commission to amend the current EAS rules by accepting an EAS Decoder-only solution for cable television operators.

Respectfully submitted,

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